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February 22, 2012

Hon. Nicholas G. Garaufis
United States District Judge
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201
Via ECF

Re: USA v. Herron, et.al. (Jorge Mejia)
Docket No. 10-CR-615 (S-2)(NGG)

Dear Judge Garaufis:

By appointment of the Court pursuant to the Criminal Justice Act, I represent the defendant, Jorge Mejia, in the above-referenced matter, and write following telephone calls today with chambers and government counsel (Assistant U.S. Attorney Matthew Amatruda) to respectfully request, for the reasons outlined below, adjournment of sentence, now calendared for March 2, 2012.

The pre-sentence investigation report (the "PSR") was received on February 15, 2012, and mailed that same day to Mr. Mejia. I met with him on February 21st to discuss the PSR and specific issues pertaining to his sentence, and again today. He has not yet received the PSR. In addition, I need more time to research and prepare a memorandum of law addressing the sentencing issues as I view them, and wish to provide government counsel (Assistant U.S. Attorney Carter Burwell), who, I am informed, will not return to his office until February 28th, sufficient time to respond to the memorandum. Further, it has become necessary for me to be out of the city on the date now set for sentence.

Government counsel (Mr. Amatruda) has consented to this request, and, following the conversation with chambers today, a new sentence date has been calendared by chambers for March 23, 2012 at 11:00 am. I have informed Mr. Amatruda of the foregoing. Thank you for your consideration of this request.

Respectfully submitted,

Robert L. Moore

